



August 17, 2015

Via email to: NISP.EIS@usace.army.mil

John Urbanic, NISP EIS Project Manager
U.S. Army Corps of Engineers,
Omaha District – Denver Regulatory Office
9307 S. Wadsworth Blvd.
Littleton, CO 80128

**Re: Comments on Behalf of the Town of Erie in Support of the Northern
Integrated Supply Project**

Dear Mr. Urbanic:

The Town of Erie is one of the 15 Colorado northern Front Range participants in the Northern Integrated Supply Project (NISP). The Town of Erie Board of Trustees is sending this letter in support of NISP.

In the more than ten years since the NISP EIS process started, Erie's population has more than doubled, and continues to grow at a rapid pace. Erie has methodically increased its water rights portfolio over those years to meet these new demands. NISP represents a very significant step in meeting Erie's future water demand, and has long been an integral part of Erie's plan to meet build-out demands for the Town.

Erie's water supply planning is multi-faceted, focused on both supply-side and demand-side solutions to meet its growing water demand. The implementation of the Town of Erie's state-approved Water Conservation Plan is very important to the Town, but conservation on its own will not provide enough water to meet Erie's growing population. For example, Erie's average per capita per day (gpcd) treated water demand reached a high of 276 gpcd in 2002. Erie implemented a Water Conservation Plan in 2008, and recently had a new Plan approved by the Colorado Water Conservation Board. It's average treated water demand has been reduced to 142 gpcd, a 48% reduction in gpcd from 2002 levels.

The Town also has constructed a new wastewater treatment plant and a 1,000 acre foot reuse reservoir to provide water for non-potable irrigation. The use of this reservoir maximizes the use of the Town's water rights which are decreed for reuse. Currently, the Town provides non-potable water for a variety of outdoor irrigation demands.

The Town of Erie is proud of these significant conservation water savings. Erie's annual treated water use has increased by approximately one-third from 2002 to 2014 to support a more than doubling of the population. This demonstrates that despite the significant and continued success of the Town's water conservation efforts, water conservation alone will not be adequate to meet its

increasing water demands. Rather, the Town must continue to develop new water supply projects such as NISP.

NISP is an excellent water supply project for Erie and the other northern Colorado participants, relying on storage of native water supplies to meet regional needs. In municipal water supply planning in Colorado, projects that involve storage, such as NISP, are especially critical in developing a firm and reliable water supply. On an annual basis, reservoirs are critical in retiming excess water available during spring runoff so that it can be available in the late summer when limited river supplies are available only to the most senior water rights and demand is at its highest. Reservoirs also play a critical role in drought planning, storing water from year to year to ensure an adequate supply even during successive drought years when demand exceeds a drought-limited natural water supply.

NISP is a collaborative, regional project that will play a key role in addressing northern Colorado's challenging water future while addressing environmental concerns in a proactive way. The SDEIS provides exhaustive analyses of the potential impacts of the NISP alternative. The NISP participants have proposed a conceptual mitigation plan, included as Appendix F to the SDEIS, to avoid and minimize environmental effects and to actually enhance environmental resources. Further, Glade Reservoir will be a significant new offstream flat water recreational amenity for the citizens of Colorado. Moreover, in order to meet future water demand in northern Colorado, the realistic alternatives to NISP would require a combination of other reservoir projects and permanent "buy and dry" of agricultural lands, an approach that has been disfavored as a sole solution to future water shortfalls in the current second draft of the Governor's State Water Plan.

In sum, Erie is relying on NISP to meet water demands in the near future and NISP is an environmentally responsible project which will meet those needs while providing many benefits to northern Colorado. The Town of Erie respectfully requests that the U.S. Army Corps of Engineers accept NISP as the preferred alternative in the SDEIS and that it assist in expediting the remainder of the permitting for NISP to the extent possible.

Thank you for the opportunity to provide these comments.

Sincerely,

TOWN OF ERIE BOARD OF TRUSTEES

By: 

Tina Harris, Mayor

cc: A.J. Krieger
Gary Behlen
Paul Zilis
Brian Werner